

I oppose loosening the rules designed to promote and protect diversity of media ownership. These rules were adopted to ensure that the public would receive a diverse range of viewpoints from the media, and not simply the opinions of a handful of media conglomerates.

Ownership & operations of media must be clearly delineated by oversight boards before engagement of said rules. This delineation as a result of the actions of oversight boards must also be verified by third parties not tied to the FCC or broadcaster after engagement of said rules.

Commercial competition is not based on fixed and immutable rules but on fluid exchange between demanders and suppliers. Diversity should be measured according to QUANTITY and QUALITY OF SPECTRUM.

Locally owned community media outlets are in the presence of local communities. Because of that physical proximity they're more accountable to the community's needs. Identifiable & verifiable ownership & operations is by definition locally owned community media outlets.

Broadcast TV is more important than ever. The key to future TV sales is to facilitate interaction between people, not TVs or TV programs. This is not unlike chat channels on the Internet (ICQ, IRC). Currently it is not commercially possible to chat or interact via your TV.

Ownership rules must have measurable deliverables or verifiable performance and be accountable & auditable not only to the committees/organizations that commission those rules but to the public the rules serve.

Consolidation is the centralization of ownership & operations. Diversification is decentralization of these things both in terms of performance and logistics or strategic planning. Consolidation has circumvented diversified community-based (e.g. corporate-based) news reporting by relying on corporate-based rules of operation instead of community rules. Larger media companies with heavy consolidation do not strengthen reporting and analysis and in fact have weakened it with predatory and monopolistic control tactics over distribution and syndication of available media and network (bandwidth).

Many outlets have formed but others still remain undeveloped. The Internet (WWW, USENET, E-mail, chat) is perhaps the best example of an increase in media owned and/or controlled by persons of color and women.

As long as cable television design & commissioning blocks the ability of people to interact with other people via TV (NOT interact with TV sets/programs--a flawed concept from the beginning) TV will stagnate and go nowhere.

"Commonly owned media" is a misnomer and a red herring. As stated previously, verifiable ownership & operations of media are measurable deliverables. They are line-item elements solidly connected to the operation of an activity like TV or radio. Both demanders and suppliers can own stake or shares in operation of TV or radio and invoke licensing conditions if need be for flexible terms of engagement.

Given the fact 802.11 wireless Internet and ultra-wideband ([www.uwb.org](http://www.uwb.org)) are going mainstream there is an ever increasing number of alternative providers of delivered video programming. This is because the spectrum is

being reallocated and opened up for more content. This transition allows for augmentation with existing bandwidth sectors (dial-up, broadband, fiber-optic backbones).

The FCC Commission should allow for the deliberation and formation of multiple commissions not connected to the FCC to assess, tally and rate web sites and cable channels. The FCC should not be involved past the initial decision-making processes these multiple commissions take on. The multiple commissions will be formed and based on local, community needs with help from businesses.